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From:

Carter Crawford - TPC

To: Date: **David Solomon** 5/16/03 11:31AM

Subject:

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To: David Solomon, Federal Communications Commission

MAY 1 6 2003

Federal Communications Commission

Office of Secretary

02-277

Cc: Senator Ted Stevens

From: Carter Crawford, 107 Maple Drive, Fairbanks Ak. 99709. tpc-ccrawford@gci.com

RE: Cross Ownership of newspapers and broadcast 5/16/03

I have resisted writing you my thoughts simply because I have questioned whether a single individual consumer would have any impact. From what I have read, all the comments on both sides have come from large groups, and yet certain of you have strived to get grass roots input. But no public community hearings could be held in Alaska, so that opportunity has not been available.

However the articles in, and arrogance of, our local paper have inspired me.

I will try to keep my comments objective, but they are based on what we see in a small market. My hope and request is that you do not make one blanket policy for all markets, and that in smaller markets, perhaps 150 or even 175+ you look at the individual circumstances.

Your goal is more localism, diversity of voices, and a free enterprise system which encourages competition, including new minority voices. I fail to see how any of the consolidation in broadcasting has achieved that. And certainly merging two very diverse news cultures like print and broadcast will create new problems with turf wars and quality. To date, in this small market we have experienced consolidation in radio. It has created two entities which control 90% of the stations, increased rates, and decreased local programming and news staff in one case.

This is television market 203. It has one daily newspaper, 3 full-time and one lower broadcast network station (CBS), one strong public station and a non-rated, non-profit religious station.

Since my return to Fairbanks three years ago I have seen clear evidence of the paper operating as if they already owned the tv station on which they have an option. They have said repeatedly you will give them permission to buy. In this case the tv station is

by far the largest and most successful station in Fairbanks; commanding an estimated half of the broadcast tv market billing. Policies and procedures implemented by the paper have hindered attempts by the competing tv stations to grow. HOW?

Refusal to do any copromotions with anyone but the ty station intended for purchase

Biased coverage of events, favoring those by "their" to station and ignoring or minimizing those by the rest.

Refusal to even discuss in print the upcoming FCC changes regarding cross ownership until this week. Suddenly articles started appearing, hinting that the FCC was finally going to allow the local paper to buy the lead to station. This of course has prevented the public from making comment because the majority did not know this was coming. Now it is almost too late.

Increasing the branding of "their" to station by giving free space to the to weather person on page 2 every day, and a sports column to the TV Sports Director on page 1 of the Sports Section. I do not know if this more than once weekly.

Using the newspaper reporters who write for the paper's midnight deadline to cover events for the station's 11pm and morning news updates. But it has only succeeded in angering the reporters who felt their hard work was now not new news in the am. Despite any efforts of collaboration, there is no improvement in content and delivery on either product. In fact both entities were serving our communities with more and

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better quality local news when they were locally owned. Corporate America is only concerned with eyeballs and profits and that has nothing to do with localism and quality.

While the broadcast facility says there will be no decrease in staff with the merger, the paper says otherwise. And to merge two very different cultures into one cooperative news staff will be very difficult. This is a small market where a pool of talent does not exist. Already the tv station struggles to find reporters. Some newspaper reporters have already threatened to quit if the merger takes place and they have to write for tv. This is not Seattle or Portland etc where the company can simply tell the staff accept it or leave. This market has the same television news challenges as other small markets in convincing television news talent to come, or stay if locally educated, and then not leave after a year with their new video portfolio.

Perhaps most important is the position in which it is already putting the competing stations. The paper has a monopoly and with the purchase of the leading to station it will make it even more difficult for the rest of the stations to compete. No doubt they will have joint packages, which could make the paper's rates far more attractive than another broadcast station. When the biggest events in town are owned by the two, when the paper can continually provide free coverage and branding for the station and the station can provide the same for the paper, the value of the competing stations is tremendously diminished. This is not healthy competition.

According to local paper's owner, studies show that where cross ownership exists in grand fathered markets no damage has occurred. I find that difficult to believe, especially after his comments implying that the tv station in Fairbanks will add coverage his paper lacks in the outlying markets. THAT IS ABSOLUTELY UNTRUE. The only station that can provide coverage of the rural markets is the station owned by Smith Broadcasting. The lead tv station in Fairbanks only has coverage in the Borough and via translaters in Delta. They do not reach Nome etc.

Free enterprise in Fairbanks will come to an end in broadcasting if the FCC passes one rule applying to all size markets. I urge you to revisit the new regulations for small markets and develop a system, which allows for the individual situations such as market 203; where if a new monopoly is created, there is irrefutable harm to quality, competition and diversity of opinions.